UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF ILLINOIS

CYNTHIA STEINER	)	
	)	
Plaintiff,	)	
	)	Case No. 16-CV-1286
v.	)	
	)	JURY TRIAL DEMANDED
SHERIFF MICHAEL EVERETT	)	
	)	
And	)	
	)	
WAYNE COUNTY SHERIFF'S DEPARTMENT	)	
	)	
And	)	
	)	
WAYNE COUNTY ILLINOIS,	)	
a municipal corporation	)	
Defendants,	)	

COMPLAINT

Plaintiff Cynthia Steiner, by and through Counsel, Kaufhold and Associates P.C., brings this suit against the Sheriff of Wayne County, Illinois and Wayne County Illinois, a municipal corporation. Plaintiff alleges and states as follows:

PRELIMINARY STATEMENT

1. Plaintiff Cynthia Steiner brings claims against Defendants for sexual discrimination, sexual harassment, and retaliation under the Civil Rights Act, 42 U.S.C. 2000e et seq. ("Title VII").

2. Plaintiff also brings claims against Defendants for Age Discrimination and Retaliation for opposing Age Discrimination under the Age Discrimination in Employment Act, 29 USC § 623.

3. Plaintiff brings individual claims against Defendants for Disability Discrimination and Retaliation for opposing Disability Discrimination under the Americans with Disabilities Act, 42 U.S.C. 126.
4. Plaintiff brings claims against Defendants for sexual discrimination, sexual harassment, age discrimination, disability discrimination, and retaliation under the Illinois Human Rights Act, 775 Ill. Comp. Stat. Ann. 5 et. seq. ("IHRA").
5. Plaintiff brings claims against Defendants for retaliatory discharge under Illinois Common Law.
6. Prior to the institution of this lawsuit, Plaintiff filed charges with the Illinois Department of Human Rights and the U.S. Equal Opportunity Commission against the Defendants alleging violations of Title VII of the Civil Rights Act, Age Discrimination in Employment Act, American with Disabilities Act, and the Illinois Human Rights Act. Plaintiff received a "Right to Sue" notice on September 7, 2016. (Attached Exhibit A). This lawsuit was commenced within ninety (90) days thereafter, and all conditions precedent to the institution of this lawsuit have been performed or have occurred.

PARTIES

7. Plaintiff Cynthia Steiner (hereinafter "Plaintiff" or "Steiner") is an adult citizen and resident of the state of Illinois.
8. Sheriff Michael Everett (hereinafter "Defendant Sheriff" or "Sheriff"), in his official capacity, is the chief executive officer for the Wayne County Sheriff's Office and Plaintiff's employer as defined by 42 U.S.C. § 2000e(b) and Illinois state laws. Defendant Sheriff is commissioned under the laws of the state of Illinois. Illinois Const., Art. VII § 4. Defendant Sheriff manages, directs, and maintains operational control of

the day-to-day functions of the Wayne County Sheriff Department, supervises and directs the Department's deputies and correctional guards and implements Defendant Wayne County's policies and procedures.

9. Wayne County Sheriff Department (hereinafter "Defendant Department") is a body corporate and politic and Plaintiff's employer as defined by 42 U.S.C. § 2000e(b) and Illinois state laws. Wayne County Sheriff Department is a political subdivision of Wayne County, Illinois. The principal place of business for Wayne County Sheriff Department is 305 East Court Street, Fairfield, Illinois. Defendant Department employs more than twenty (20) individuals.

10. Defendant Wayne County is a body corporate and politic and Plaintiff's employer as defined by 42 U.S.C. § 2000e(b) and Illinois state laws. Defendant County is required to indemnify Sheriff pursuant to 55 ILCS 5/5-1002 and required to pay any judgments against Sheriff pursuant to 745 ILCS 10/9-102. Its principal place of business is 307 E. Court Street, Fairfield, Illinois. Wayne County employs more than twenty (20) individuals.

JURISDICTION AND VENUE

11. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1343 because the Plaintiff's claims, 42 U.S.C. § 2000e, 42 U.S.C. 126, and 29 USC § 623, arise under federal law.

12. This Court has supplemental jurisdiction over the causes of action of Plaintiff pursuant to 28 U.S.C. § 1367 because these claims are so related to the federal claims that they form part of the same case or controversy.

13. This Court has jurisdiction to issue a declaratory judgment for the foregoing violations pursuant to 28 U.S.C. §§ 2201 and 2202.

14. Venue is proper in this District under 28 U.S.C. § 1391(b) because the Defendants operate its principle place of operation being located within the District and because a substantial part of the events giving rise to the claims occurred within the Southern District of Illinois, as more fully described below.

FACTUAL ALLEGATIONS

15. Plaintiff is a sixty-one (62) year old woman who resides in the city of Fairfield, Illinois.

16. Defendants employed Plaintiff from December 1, 1996 until March 1, 2016.

17. Plaintiff is cross-trained as a correctional officer and dispatcher as are most correctional officers of the Sheriff's Department.

18. For all relevant times, Plaintiff suffered from rheumatoid arthritis, fibromyalgia, and hearing loss.

19. For all relevant times and until her termination, Plaintiff was first in seniority of all correctional officers.

20. Defendants subjected Plaintiff to derogatory harassment and unequal terms of employment based upon her sex, age, and disability. Furthermore, Defendants retaliated against Plaintiff for opposing the harassment and unequal terms of employment.

21. Defendants actions fostered a hostile and intimidating work environment. As a result of Defendants' actions, Plaintiff's work performance and health suffered substantially.

22. For instance, in June 2014, Plaintiff reported an inmate's medical issue to Chief Deputy Andy Milner ("Milner"), Plaintiff's supervisor. While discussing the issue with Milner, Correctional Officer Ranken ("Ranken"), a co-worker, accused Plaintiff of causing the

medical issue by "flipping her tits" at the inmate. Milner and Ranken laughed at the comment. Plaintiff felt humiliated and embarrassed by the conduct.

23. Plaintiff reported this incident, among others, to Defendant Sheriff Everett and Milner. Defendant Sheriff serves as head supervisor of the Sheriff's department and Plaintiff's senior commander.

24. During the meeting, Milner accused Plaintiff of "flipping her tits" at the inmate as Ranken had suggested previously. Defendant Sheriff Everett and Milner both chuckled at the comment. Again, Plaintiff felt humiliated and embarrassed by the conduct.

25. As well as reporting the comment, Plaintiff reported additional harassing behavior. More specifically, Plaintiff, along with another female correctional officer, reported harassing behavior by the male correctional guards. Plaintiff reported to her supervisors that the male guards were not completing shift duties as policy directed. Male guards routinely left cleaning duties for the women to complete. Shift duties included prepping meals, and cleaning up before and after as needed. Additionally, duties included dispensing proscribed medical to inmates.

26. After leaving the work for the female guards, male guards joked regarding how much they enjoyed leaving the mess for the women to clean up.

27. Furthermore, in the meeting, Plaintiff reported numerous instances of male guards referring to Plaintiff, and other women, as a "bitch" and other intimidating behavior.

28. Following this meeting, Plaintiff's working conditions severely deteriorated.

29. After making her report, departmental positions came up for bid. In September 2014, Plaintiff bid on the dispatcher position that she held at the time and had done so for

multiple years. Having the highest seniority, Plaintiff was entitled to the position, pursuant to the collective bargaining agreement between the parties due to her seniority.

30. Disregarding the CBA entirely, Defendant Everett segregated Plaintiff from her male coworkers by reassigning Plaintiff from dispatcher to jailer. Defendant Everett stated to Plaintiff that he made the move to “stop [her] grievances.”

31. Additionally, Defendant Everett gave the position, which Plaintiff bid on, to a younger, less experienced male correctional officer.

32. Male coworkers intensified their verbal harassment of Plaintiff in the months that followed.

33. When reporting the behavior to the Sheriff, Defendant Sheriff Everett justified the harassment, stating “those making the most money should do the most work;” directly referencing Plaintiff’s and another female guard’s seniority and age.

34. In another instance, in October 2014, two male guards harassed Plaintiff regarding Plaintiff’s August report. The men laughed at Plaintiff while calling her a “fucking lying bitch” who got “knocked off her high horse.” Plaintiff felt humiliated and embarrassed.

35. In November 2014, Plaintiff verbally requested to serve some of her shifts as dispatcher due to her medical conditions. Sheriff Everett refused to address the request.

36. On or about November 26, 2014, Correctional Officer Curry, a coworker, withdrew his service pistol and pretends to discharge weapon in the dispatch area of the department. Plaintiff reported the incident to the Sheriff, noting that this was the third such incident in a matter of weeks. Plaintiff felt intimidated and fearful for her safety.

37. On or about December 2, 2014, Plaintiff spilled something on the floor in her work area. As she went to clean it up, a male guard openly berated Plaintiff for the minor spill. The

verbal altercation became so intense that inmates attempted intervening on Plaintiff's behalf. Plaintiff felt humiliated and embarrassed.

38. Also during December 2014, Plaintiff refused another correctional officer's order to smuggle contraband to an inmate during her shift. The correctional officer verbally accosted Plaintiff for refusing the order. Upon information and belief, the correctional officer smuggled the items to the inmate following the altercation.

39. On or about December 23, 2014, a coworker yelled "you better turn those hearing aids up" at Plaintiff. Plaintiff felt signaled out due to her disability.

40. In what should be considered another threat upon Plaintiff's safety, Correctional Officer Pope withdrew his service weapon inside the department when no threat was present. While doing so, Pope called Plaintiff's name to ensure she witnessed the action. Again, Plaintiff felt intimidated and fearful for her safety.

41. On or about January 6, 2015, Correctional Officer Curry openly berated regarding running a vehicle check. Rather than have one of the many male correctional officers positioned at the computer run the check, Curry specifically sought out Plaintiff, who was assigned to work as a jailer that day. Plaintiff felt humiliated and harassed by Curry's verbal statements and singled out from her younger, male coworkers.

42. Following the incident and due to the many instances of harassment, Plaintiff's medical condition worsened. As a result, Plaintiff requested medical accommodations on or about January 12, 2016. The Plaintiff requested to work a portion of her weekly hours in the sedentary role of dispatch. Again, Sheriff refused to accommodate the request.

43. Later that day, Correctional Officer Miller refused to aid in the preparation of meals and/or work the radio in dispatch. Miller's refusal required Plaintiff to perform tasks as both jailer and dispatcher.

44. On or about January 15, 2016, Defendants required Plaintiff to work involuntary overtime in the kitchen area. Plaintiff worked the overtime as three younger, male coworkers refused to assist in the completion of any duties. As Plaintiff exited the building at the end of her involuntary shift, the male coworkers openly mocked Plaintiff. The men found it humorous that Defendants forced Plaintiff to work over to cover the cleaning duties that the men refused to do. Plaintiff felt humiliated, embarrassed, and persecuted.

45. In a false attempt at addressing Plaintiff's complaints, Defendant Sheriff instituted a new policy regarding the use of electronics during the workday. Additionally, Defendants redistributed work duties by reallocating many of the cleaning duties to Plaintiff's shift. However, Defendant Sheriff did not enforce the policy following its enactment. Male guards continued to use electronic devices while not completing assigned duties without repercussions.

46. About a week after issuing the new policy, on or about February 17, 2015, Sheriff Everett scolded a female coworker for attempting to assist Plaintiff in completion of her newly assigned cleaning duties. The Sheriff, along with a male correctional officer, refused to allow the female guard from completing the task as it was not part of her shift duties.

47. As the duties increased, Plaintiff's health decreased. As such, Plaintiff took an increasing number of vacation days in attempts to recuperate. The male guards tracked her sick time; at times, noting to the Sheriff that Plaintiff should be running out of sick time.

48. On or about March 23, 2015, Plaintiff provided the Sheriff with a letter from her doctor limiting her work duties. Based upon the accommodations in the note, Plaintiff, again, requested to serve time at dispatch. Sheriff provided limited accommodations for a short period of time.

49. Sheriff continued to assert that no position was available to accommodate Plaintiff, or another older, female guard seeking similar accommodations. Sheriff asserted this even as he accommodated another female guard who required stronger accommodations than Plaintiff requested.

50. In March 2015, Sheriff continued to harass and retaliate against Plaintiff. This time, the department refused to include Plaintiff and another female guard, who made similar accusations of harassment and retaliation, in departmental training opportunities.

51. On or about March 24, 2015, the Defendant Sheriff sent three male correctional officers to “jail standards” training. Defendant Sheriff did so even though the men rarely served in the jailer capacity. Defendant Sheriff did not send the two women, one being the Plaintiff, who primarily served as jailers.

52. Also on or about March 24, 2015, Defendant Sheriff scheduled mandatory CPR training for all other guards. Defendant Sheriff prevented Plaintiff from attending the CPR training by scheduling her to perform other duties.

53. During April 2015, the Defendant Sheriff sent another group of male guards to “jail standards class.” Again, Defendant Sheriff did not offer the training to Plaintiff.

54. In another instance, during May 2015, Defendant Sheriff sent a group of male guards, including the Sheriff and Chief Deputy to a class regarding the use of Tasers. Defendant Sheriff did not offer the training to Plaintiff.

55. At the end of May 2015, the guards bid on positions based upon security. Again, the Plaintiff bid on a dispatcher position. Again, the Sheriff passed over the Plaintiff requiring her to continue working in the in the back as jailer.

56. On or about June 30, 2015, five or six male guards refuse to assist Plaintiff complete shift duties. Instead, the group take an extended lunch together. By doing so, the group left behind a host of unfinished duties for Plaintiff to complete single handedly.

57. On or about July 1, 2015, a male correctional guard refused to complete shift-cleaning duties. Instead, the male officer watched in amusement as Plaintiff completed the duties.

58. On or about July 7, 2015, two male correctional officers harass Plaintiff by making loud noises as she attempts to work radio call while assisting in dispatch. The men laughed as Plaintiff struggled to hear the caller. Plaintiff felt humiliated and embarrassed as a result.

59. On or about July 21, 2015, five or six male guards go to lunch together while leaving Plaintiff alone in the department to tend to the radio and inmates.

60. At this point, the inmates, knowing the extent of the harassment endured by Plaintiff, invite Plaintiff to eat lunch with them. Plaintiff felt humiliated as she realized that she was equal to the inmates in the eyes of her male coworkers.

61. On or about July 26, 2015, two male guards refuse to clean up after serving the inmates a meal. Instead, the two guards leave the mess for Plaintiff. The same two guards did the same on or about July 28, 2015. This time, one of the men states to Plaintiff that he "loves working with you" in a demeaning tone. Plaintiff felt humiliated and embarrassed.

62. In another form of harassment/retaliation, Defendant granted special treatment to male guards. For instance, on or about August 9, 2015, Correctional Officer Miller received

priority assignment to dispatch due to working a fourteen-hour shift reasoning that he got preferential assignment due to the length of his work shift. However, the following day, when Plaintiff served the same fourteen-hour shift, Defendant assigned her to work in the jail. Instead, Miller, whose shift totaled eight hours, worked dispatch over Plaintiff's objections.

63. On or about August 28, 2015, positions reopened for bid. Along with bidding on a dispatch position, Plaintiff provided a medical slip describing work limitations consistent with the dispatch position. Even though Plaintiff had seniority, Defendant Sheriff refused to grant her the position and accommodations. Rather, Defendant Sheriff gave the position to the male guard at the center of the harassment towards Plaintiff.

64. The following month, Defendant Sheriff sent written correspondence to Plaintiff stating that no position meeting her accommodations was available. As such, Defendant Sheriff called for a Fitness for Duty Examination. Defendant Sheriff put Plaintiff on paid administrative leave pending the outcome of the examination.

65. As part of the duty examination, Defendant Sheriff required he be allowed to attend medical evaluation appointment with Plaintiff. When Plaintiff refused, Defendant Sheriff sent notice of pre-disciplinary hearing against Plaintiff.

66. Prior to voting on a proposed action against Plaintiff, two members of the merit commission resign preventing a vote on disciplinary action against Plaintiff.

67. On or about April 1, 2016, Defendant stopped paying Plaintiff entirely. To date, Defendants have provided Plaintiff with no notice regarding her termination, nor the reasoning behind it. Furthermore, Defendants have not taken the matter before the

appropriate merit commission or provided Plaintiff with notification of any hearing taken place on the matter.

68. The accumulation of unwanted sexual gestures and comments by Defendants and Defendants employees created a hostile and intimidating working environment in which Plaintiff felt uncomfortable working. Additionally, the unwanted comments and gestures regarding Plaintiff's gender, age, and disabilities created a hostile and intimidating working environment in which Plaintiff uncomfortable working.

69. Furthermore, younger, male employees were not subjected to the same treatment. As such, Defendants conduct, as well as that of their employees created unequal terms of employment for Plaintiff due to her sex, age, and disabilities.

70. The compilation of harassment, discrimination, and retaliation substantially interfered with Plaintiff's performance of her duties.

COUNT I: SEXUAL DISCRIMINATION UNDER TITLE VII

71. Plaintiff incorporates the above stated paragraphs of this Complaint by reference.

72. Title VII prohibits discrimination based on race, color, religion, sex, and national origin. Title VII also prohibits an employer from retaliating against an employee who opposes sexual discrimination in the workplace. 42 U.S.C. 2000e et. seq.

73. Defendant Sheriff is a person within the meaning of 42 U.S.C. § 2000e(a) and an employer within the meaning of 42 U.S.C. § 2000e(b).

74. Defendant Department is a person within the meaning of 42 U.S.C. § 2000e(a) and an employer within the meaning of 42 U.S.C. § 2000e(b).

75. Defendant Wayne County is a person within the meaning of 42 U.S.C. § 2000e(a) and an employer within the meaning of 42 U.S.C. § 2000e(b).

76. Plaintiff is an employee within the meaning of 42 U.S.C. § 2000e(f).

77. Defendants discriminated against Plaintiff by subjecting her, and other female employees, to disparate treatment and unequal terms of employment on the basis of her sex in violation of Title VII, 42 U.S.C. 2000e-2, by (1) giving younger, less experienced males priority in position assignment over legitimate business needs, (2) subjecting Plaintiff to a hostile work environment by berating Plaintiff, and allowing younger, male coworkers to berate Plaintiff extensively while not subjecting male employees to similar treatment, (3) giving younger, less experienced males authority over Plaintiff, (4) subjecting Plaintiff to a hostile work environment by allowing younger, male employees to threaten Plaintiff with the brandishing a deadly weapon generally in her direction and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying debris, (5) reassigning Plaintiff, (6) failing to adequately address Plaintiff's complaints, (7) refusing to allow Plaintiff to attend training classes for personal and professional growth, (8) subjecting Plaintiff to unequal terms of employment, and (9) constructively discharging Plaintiff without proper notice and hearing.

78. Defendants did not have adequate policies or procedures in place to address sexual discrimination, nor did it implement prompt remedial measures when notified of the employment practices violating Title VII.

79. Defendants are strictly liable for the sexual discrimination committed by Sheriff Everett and Chief Deputy Milner. Defendants are vicariously liable for the sexual discrimination engaged in towards Plaintiff by the remaining employees of the Sheriff's Department.

80. As proximate result of this discrimination, the Plaintiff has lost wages, employee benefits, and suffered humiliation, pain, and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendants' violations of her rights including:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper

COUNT II: RETALIATION FOR OPPOSING SEXUAL DISCRIMINATION

81. Plaintiff realleges the above stated paragraphs of this Complaint as if stated herein.

82. Title VII also prohibits an employer from retaliating against an employee who opposes sexual discrimination in the workplace. 42 U.S.C. § 2000e et seq.

83. Plaintiff opposed sexual discrimination in the workplace by reporting the discrimination to Defendants via Defendant Everett and Chief Deputy Milner.

84. Defendants violated Title VII by retaliating against Plaintiff by: (1) reassigning Plaintiff and stripping her of her primary duties, (2) placing Plaintiff on administrative leave, (3) terminating Plaintiff's employment, (4) degrading Plaintiff in front of coworkers, (5) failing to implement adequate policies to prevent discriminatory and retaliatory behavior, (6) assigning younger, inexperienced, male employees to Plaintiff's positions, (7) subjecting Plaintiff to a hostile work environment by allowing younger, male employees to threaten Plaintiff by brandishing a deadly weapon generally in her direction and presence, and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying

debris, (8) subjecting Plaintiff to unequal terms of employment, (9) and refusing to allow Plaintiff to attend training classes for personal and professional growth.

85. Defendants did not have adequate policies or procedures in place to address the retaliation, nor did it implement prompt remedial measures when notified of the employment practices violating Title VII.

86. Defendants are strictly liable for the retaliation committed by Sheriff Everett and Chief Deputy Milner. Defendants are vicariously liable for the retaliation engaged in towards Plaintiff by the remaining employees of the Sheriff's Department.

87. As a proximate result of this retaliation, the Plaintiff has lost wages, employee benefits, and suffered humiliation, pain, and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendants' violations of her rights including:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper

COUNT III: SEXUAL HARASSMENT UNDER TITLE VII

88. Plaintiff realleges the above stated paragraphs of this Complaint as if stated herein.

89. Title VII prohibits employment discrimination based on race, color, religion, sex and national origin. Title VII also prohibits an employer from retaliating against an employee who opposes sexual harassment in the workplace. 42 U.S.C. 2000e et seq.

90. Defendants violated Title VII by making inappropriate comments and gestures towards Plaintiff and repeated sexual comments about her, and other women, in her presence and to others continuously over the course of her employment. Furthermore, Defendants failed to adequately address comments and gestures by employees towards Plaintiff upon Defendants becoming aware of the conduct. Defendants, via Defendant Everett and other male employees, created a hostile and intimidating work environment that ultimately interfered with Plaintiff's physical and mental health, as well as Plaintiff's work performance.

91. Defendants did not have adequate policies or procedures in place to address the sexual harassment, nor did it implement prompt remedial measures when notified of the employment practices violating Title VII.

92. Defendants are strictly liable for the harassment committed by Sheriff Everett and Chief Deputy Milner. Defendants are vicariously liable for the sexual harassment engaged in towards Plaintiff by the remaining employees of the Sheriff's Department.

93. As a proximate result of this harassment, the Plaintiff has lost wages, employee benefits, and suffered humiliation, pain, and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendants' violations of her rights including:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper

COUNT IV: RETALIATION FOR OPPOSING SEXUAL HARASSMENT UNDER TITLE VII

94. Plaintiff realleges the above stated paragraphs of this Complaint as if stated herein.

95. Title VII also prohibits an employer from retaliating against an employee who opposes sexual harassment in the workplace. 42 U.S.C. 2000e et seq.

96. Plaintiff opposed sexual harassment in the workplace by reporting the harassment to Defendants via Defendant Everett and Chief Deputy Milner.

97. Defendants violated Title VII when it retaliated against Plaintiff and allowed employees to retaliate against Plaintiff without repercussions. Retaliatory actions committed against Plaintiff include (1) reassigning Plaintiff and stripping her of her primary duties, (2) placing Plaintiff on administrative leave, (3) terminating Plaintiff's employment, (4) degrading Plaintiff in front of coworkers, (5) failing to implement adequate policies to prevent discriminatory and retaliatory behavior, (6) assigning younger, inexperienced, male employees to Plaintiff's positions, (7) subjecting Plaintiff to a hostile work environment by allowing younger, male employees to threaten Plaintiff by brandishing a deadly weapon generally in her direction and presence, and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying debris, (8) subjecting Plaintiff to unequal terms of employment, (9) and refusing to allow Plaintiff to attend training classes for personal and professional growth.

98. Defendants did not have adequate policies or procedures in place to address the retaliation, nor did it implement prompt remedial measures when notified of the employment practices violating Title VII.

99. Defendants are strictly liable for the retaliation committed by Sheriff Everett and Chief Deputy Milner. Defendants are vicariously liable for the retaliation engaged in towards Plaintiff by the remaining employees of the Sheriff's Department.

100. As a proximate result of this retaliation, the Plaintiff has lost wages, employee benefits, and suffered humiliation, pain, and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendants' violations of her rights including:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper

COUNT V: AGE DISCRIMINATION UNDER TITLE VII

101. Plaintiff realleges the above stated paragraphs as if stated herein.

102. It is the purpose of the Age Discrimination in Employment Act to promote employment of older persons based on their ability rather than their age and to prohibit arbitrary age discrimination in employment. 29 U.S.C. § 621 et. seq.

103. Defendant Sheriff is a person within the meaning of 29 U.S.C. § 630(a) and an employer within the meaning of 29 U.S.C. § 630(b).

104. Defendant Department is a person within the meaning of 29 U.S.C. § 630(a) and an employer within the meaning of 29 U.S.C. § 630(b).

105. Defendant County is a person within the meaning of 29 U.S.C. § 630(a) and an employer within the meaning of 29 U.S.C. § 630(b).

106. Plaintiff is an employee within the meaning of 29 U.S.C. § 630(f) and is over the age of forty (40) as required by 29 U.S.C. §631(a).

107. Defendants violated the Plaintiff's rights, as granted under the Age Discrimination in Employment Act, by making materially adverse employment actions based upon Plaintiff's age. For instance, Defendant Sheriff assigned work tasks to Plaintiff due to her age and seniority status in the department. Furthermore, Defendant Sheriff engaged in verbal comments and gestures regarding Plaintiff's age alongside Plaintiff's younger coworkers. Defendant Sheriff failed to address harassing comments and gestures made towards Plaintiff upon the Plaintiff's, and other older employees, complaints regarding the behavior.

108. The Defendant did not have adequate policies or procedures in place to address the age discrimination, nor did it implement prompt remedial measures when notified by Plaintiff of the age discrimination. Instead, Defendant segregated Plaintiff, before ultimately terminating her.

109. Defendants are liable for age discrimination engaged in towards Plaintiff.

110. As a proximate result of this discrimination, Plaintiff suffered lost wages, employee benefits, humiliation, emotional turmoil, and pain and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendant's violations of her rights including:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper

COUNT VI: RETALIATION FOR OPPOSING AGE DISCRIMINATION

111. Plaintiff realleges the above stated paragraphs of this Complaint as if fully set out herein.

112. The Age Discrimination in Employment Act prohibits retaliation against employees who oppose discrimination on the basis of a person's age.

113. Plaintiff opposed discrimination on the basis of her age by reporting discriminatory behavior to her supervisors, Sheriff Everett and Chief Deputy Milner.

114. The Defendant retaliated against the Plaintiff for opposing age discrimination by: (1) reassigning Plaintiff and stripping her of her primary duties, (2) placing Plaintiff on administrative leave, (3) terminating Plaintiff's employment, (4) degrading Plaintiff in front of coworkers, (5) failing to implement adequate policies to prevent discriminatory and retaliatory behavior, (6) assigning younger, inexperienced, male employees to Plaintiff's positions, (7) subjecting Plaintiff to a hostile work environment by allowing younger, male employees to threaten Plaintiff by brandishing a deadly weapon generally in her direction and presence, and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying debris, (8) subjecting Plaintiff to unequal terms of employment, (9) and refusing to allow Plaintiff to attend training classes for personal and professional growth.

115. The Defendants failed to prevent the retaliatory behavior by not having adequate policies in place. Defendants failed to take remedial actions upon being notified of the retaliatory behavior.

116. Defendants are liable for the retaliatory actions committed against the Plaintiff.

117. As a result of the retaliatory treatment, Plaintiff suffered lost wages, humiliation, lost benefits, pain, and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendant's violations of her rights including:

a. Lost Wages
b. Lost Benefits
c. Humiliation and Embarrassment
d. Pain and Anguish
e. Litigation Expenses including Attorney's Fees
f. Any other relief this Court deems just and proper

COUNT VII: DISABILITY DISCRIMINATION

118. Plaintiff realleges the above stated paragraphs of this complaint as stated fully herein.

119. The purpose of the American Disabilities Act is to provide clear, strong, consistent, enforceable standards addressing discrimination against individuals with disabilities. 42 U.S.C. 126, § 12101(b).

120. Defendant Sheriff is a covered entity within the meaning of 42 U.S.C. 126 § 12111(2) and an employer within the meaning of 42 U.S.C. 126 § 12111(5).

121. Defendant Department is a covered entity within the meaning of 42 U.S.C. 126 § 12111(2) and an employer within the meaning of 42 U.S.C. 126 § 12111(5).

122. Defendant County is a covered entity within the meaning of 42 U.S.C. 126 § 12111(2) and an employer within the meaning of 42 U.S.C. 126 § 12111(5).

123. Plaintiff is an employee within the definition of 42 U.S.C. 126 § 12111(4) and a person with a disability within the meaning of 42 U.S.C. 126 § 12102(1) that affects a major life activity as defined in 42 U.S.C. 126 § 12102(2).

124. Plaintiff notified Defendant Sheriff of her medical disabilities as early as November 2014 and their impact on her work performance. Plaintiff provided written notification on or about January 12, 2015, March 23, 2015, and August 28, 2015.

125. Defendant Sheriff subjected Plaintiff to humiliating behavior after being notified of her disabilities. For instance, Defendant Sheriff assigned work tasks to Plaintiff which aggravated Plaintiff's disabilities. Furthermore, Defendant Sheriff engaged in verbal comments and gestures regarding Plaintiff's disabilities alongside Plaintiff's coworkers. Defendant Sheriff failed to address harassing comments and gestures made towards Plaintiff upon the Plaintiff's complaints regarding the behavior.

126. Defendants failed to implement policies to adequately prevent discrimination based upon Plaintiff's disabilities. Adding insult to injury, rather than implement prompt remedial measures, Defendants terminated Plaintiff.

127. Defendants are liable for the discriminatory treatment against Plaintiff.

128. As a proximate result of the discriminatory treatment, Plaintiff suffered lost wages, lost employee benefits, humiliation, and pain and mental anguish.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled to as a result of Defendants' violations of her rights including but not limited to:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper.

COUNT VIII: RETALIATION FOR OPPOSING DISABILITY DISCRIMINATION

129. Plaintiff realleges each above stated paragraph as if stated fully here.

130. The ADA also prohibits retaliation against individuals opposing disability discrimination.

131. The Plaintiff reported her disability to Defendant Sheriff on at least for occasions, beginning November 2014.

132. Subsequently, Plaintiff reported discriminatory treatment due to her disability to Defendant Sheriff and Chief Deputy Milner.

133. Defendant Sheriff retaliated against Plaintiff for opposing the discriminatory treatment by: (1) refusing to adequately investigate Plaintiff's allegations, (2) reassigning Plaintiff and stripping her of her primary duties, (3) placing Plaintiff on administrative leave, (4) terminating Plaintiff's employment, (5) degrading Plaintiff in front of coworkers, (6) failing to implement adequate policies to prevent discriminatory and retaliatory behavior, (7) assigning younger, inexperienced, male employees to Plaintiff's positions, (8) subjecting Plaintiff to a hostile work environment by allowing younger, male employees to threaten Plaintiff by brandishing a deadly weapon generally in her direction and presence, and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying

debris, (9) subjecting Plaintiff to unequal terms of employment, (10) and refusing to allow Plaintiff to attend training classes for personal and professional growth.

134. Defendant did not implement policies and procedures to prevent discriminatory treatment against employees. Further, Defendant did not implement prompt remedial measures; instead, choosing to push Plaintiff out.

135. Defendants are liable for the retaliation committed against the Plaintiff.

136. As a proximate result of the retaliatory treatment, Plaintiff suffered from lost wages, lost employee benefits, suffered humiliation, pain and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendant violating her rights including:

a. Lost Wages
b. Lost Benefits
c. Humiliation and Embarrassment
d. Pain and Anguish
e. Litigation Expenses including Attorney's Fees
f. Any other relief this Court deems just and proper.

COUNT IX: SEXUAL DISCRIMINATION UNDER IHRA

137. Plaintiff incorporates the above stated paragraphs of this Complaint by reference.

138. The IHRA prohibits employment discrimination based on race, color, religion, sex, and national origin. The IHRA also prohibits.an employer from retaliating against an employee who opposes sexual discrimination in the workplace. 775 Ill. Comp. Stat. Ann. 5.

139. Defendant Sheriff is a person within the meaning of 775 ILCS 5/1-103(L) and an employer within the meaning of 775 ILCS 5/2-101(B)(1)(c).

140. Defendant Department is a person within the meaning of 775 ILCS 5/1-103(L) and an employer within the meaning of 775 ILCS 5/2-101(B)(1)(c).

141. Defendant County is a person within the meaning of 775 ILCS 5/1-103(L) and an employer within the meaning of 775 ILCS 5/2-101(B)(1)(c).

142. Plaintiff is an employee within the meaning of 775 ILCS 5/2-101(A)

143. Defendants violated the IHRA by subjecting her, and other female employees, to disparate treatment and unequal terms of employment on the basis of her sex by (1) giving younger, less experienced males priority in position assignment over legitimate business needs, (2) subjecting Plaintiff to a hostile work environment by berating Plaintiff, and allowing younger, male coworkers to berate Plaintiff extensively while not subjecting male employees to similar treatment, (3) giving younger, less experienced males authority over Plaintiff, (4) subjecting Plaintiff to a hostile work environment by allowing younger, male employees to threaten Plaintiff with the brandishing a deadly weapon generally in her direction and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying debris, (5) reassigning Plaintiff, (6) failing to adequately address Plaintiff's complaints, (7) refusing to allow Plaintiff to attend training classes for personal and professional growth, (8) subjecting Plaintiff to unequal terms of employment, and (9) constructively discharging Plaintiff without proper notice and hearing.

144. Defendants did not have adequate policies or procedures in place to address the discrimination, nor did it implement prompt remedial measures when notified of the employment practices violating the IHRA.

145. Defendants are strictly liable for the discrimination committed by Sheriff Everett and Chief Deputy Milner. Defendants are vicariously liable for the sexual discrimination engaged in towards Plaintiff by the remaining employees of the Sheriff's Department.

146. As proximate result of this discrimination, the Plaintiff has lost wages, employee benefits, and suffered humiliation, pain, and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendant's violations of her rights including:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper.

COUNT X: RETALIATION FOR OPPOSING SEXUAL DISCRIMINATION UNDER IHRA

147. Plaintiff incorporates the above stated paragraphs of this Complaint by reference.

148. The IHRA also prohibits an employer from retaliating against an employee who opposes sexual harassment in the workplace. 775 Ill. Comp. Stat. Ann. 5.

149. Plaintiff opposed sexual discrimination in the workplace by reporting the discrimination to Defendants, on multiple occasions, via Defendant Everett and Chief Deputy Milner.

150. Defendant violated the IHRA by retaliating against Plaintiff by: (1) reassigning Plaintiff and stripping her of her primary duties, (2) placing Plaintiff on administrative leave, (3) terminating Plaintiff's employment, (4) degrading Plaintiff in front of coworkers, (5) failing to implement adequate policies to prevent discriminatory and retaliatory behavior, (6) assigning younger, inexperienced, male employees to Plaintiff's positions, (7) subjecting Plaintiff to a hostile work environment by allowing younger, male employees to threaten Plaintiff by brandishing a deadly weapon generally in her direction and presence, and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying debris, (8) subjecting Plaintiff to unequal terms of employment, (9) and refusing to allow Plaintiff to attend training classes for personal and professional growth.

151. Defendants did not have adequate policies or procedures in place to address the retaliation, nor did it implement prompt remedial measures when notified of the employment practices violating the IHRA.

152. Defendants are strictly liable for the retaliation committed by Sheriff Everett and Chief Deputy Milner. Defendants are vicariously liable for the retaliation engaged in towards Plaintiff by the remaining employees of the Sheriff's Department.

153. As a proximate result of this retaliation, the Plaintiff has lost wages, employee benefits, and suffered humiliation, pain, and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendant's violations of her rights including:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper.

COUNT XI: SEXUAL HARASSMENT UNDER IHRA

154. Plaintiff incorporates the above stated paragraphs of this Complaint by reference.

155. The IHRA prohibits employment discrimination based on race, color, religion, sex, and national origin. The IHRA also prohibits.an employer from retaliating against an employee who opposes sexual harassment in the workplace. 775 Ill. Comp. Stat. Ann. 5.

156. Defendants violated the IHRA by making inappropriate comments and gestures towards Plaintiff and repeated sexual comments about her, and other women, in her presence and to others continuously over the course of her employment. Furthermore, Defendants failed to adequately address comments and gestures by employees towards Plaintiff upon Defendants becoming aware of the conduct. Defendants, via Defendant Everett and other male employees, created a hostile and intimidating work environment that ultimately interfered with Plaintiff's physical and mental health, as well as Plaintiff's work performance.

157. Defendants did not have adequate policies or procedures in place to address the harassment, nor did it implement prompt remedial measures when notified of the employment practices violating the IHRA.

158. Defendants are strictly liable for the harassment committed by Sheriff Everett and Chief Deputy Milner. Defendant is vicariously liable for the sexual harassment engaged in towards Plaintiff by the remaining employees of the Sheriff's Department.

159. As proximate result of this harassment, the Plaintiff has lost wages, employee benefits, and suffered humiliation, pain, and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendant's violations of her rights including:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper.

COUNT XII: RETALIATION FOR OPPOSING SEXUAL HARASSMENT UNDER IHRA

160. Plaintiff incorporates the above stated paragraphs of this Complaint by reference.

161. The IHRA also prohibits an employer from retaliating against an employee who opposes sexual harassment in the workplace. 775 Ill. Comp. Stat. Ann. 5.

162. Plaintiff opposed sexual harassment in the workplace by reporting the harassment and retaliation to Defendants via Defendant Everett and Chief Deputy Milner on multiple occasions.

163. Defendant violated the IHRA by retaliating against Plaintiff by: (1) reassigning Plaintiff and stripping her of her primary duties, (2) placing Plaintiff on administrative leave, (3) terminating Plaintiff's employment, (4) degrading Plaintiff in front of coworkers, (5) failing to implement adequate policies to prevent discriminatory and retaliatory behavior, (6) assigning younger, inexperienced, male employees to Plaintiff's positions, (7) subjecting Plaintiff to a hostile work environment by allowing younger, male employees

to threaten Plaintiff by brandishing a deadly weapon generally in her direction and presence, and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying debris, (8) subjecting Plaintiff to unequal terms of employment, (9) and refusing to allow Plaintiff to attend training classes for personal and professional growth.

164. Defendants did not have adequate policies or procedures in place to address the retaliation, nor did it implement prompt remedial measures when notified of the employment practices violating the IHRA.

165. Defendants are strictly liable for the retaliation committed by Sheriff Everett and Chief Deputy Milner. Defendant is vicariously liable for the retaliation engaged in towards Plaintiff by the remaining employees of the Sheriff's Department.

166. As proximate result of this retaliation, the Plaintiff has lost wages, employee benefits, and suffered humiliation, pain, and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendant's violations of her rights including:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper.

COUNT XIII: AGE DISCRIMINATION

167. Plaintiff realleges the above stated paragraphs as if stated herein.

168. It is the purpose of the IHRA to promote employment of older persons based on their ability rather than their age and to prohibit arbitrary age discrimination in employment. 775 ILCS 5/1-102(A).

169. Plaintiff is an employee within the meaning of 775 ILCS 5/2-101(A) and is over the age of forty (40) as required by 775 ILCS 5/1-103(A).

170. Defendant violated the Plaintiff's rights, as granted under the IHRA, by making materially adverse employment actions based upon Plaintiff's age by (1) giving younger, less experienced males priority in position assignment over legitimate business needs, (2) subjecting Plaintiff to a hostile work environment by berating Plaintiff, and allowing younger, male coworkers to berate Plaintiff extensively while not subjecting male employees to similar treatment, (3) giving younger, less experienced males authority over Plaintiff, (4) subjecting Plaintiff to a hostile work environment by allowing younger, male employees to threaten Plaintiff with the brandishing a deadly weapon generally in her direction and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying debris, (5) reassigning Plaintiff, (6) failing to adequately address Plaintiff's complaints, (7) refusing to allow Plaintiff to attend training classes for personal and professional growth, (8) subjecting Plaintiff to unequal terms of employment, and (9) constructively discharging Plaintiff without proper notice and hearing.

171. The Defendant did not have adequate policies or procedures in place to address the age discrimination, nor did it implement prompt remedial measures when notified by Plaintiff of the age discrimination. Instead, Defendant terminated Plaintiff.

172. Defendant is liable for age discrimination engaged in towards Plaintiff.

173. As a proximate result of this discrimination, Plaintiff suffered lost wages, employee benefits, humiliation, emotional turmoil, and pain and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendant's violations of her rights including

a. Lost Wages
b. Lost Benefits
c. Humiliation and Embarrassment
d. Pain and Anguish
e. Litigation Expenses including Attorney's Fees
f. Any other relief this Court deems just and proper.

COUNT XIV: RETALIATION FOR OPPOSING AGE DISCRIMINATION

174. Plaintiff realleges the above stated paragraphs of this Complaint as if fully set out herein.

175. The IHRA prohibits retaliation against employees who oppose discrimination on the basis of a person's age.

176. Plaintiff opposed discrimination on the basis of her age by reporting discriminatory behavior to Defendant's corporate management team in written and via verbal interactions.

177. The Defendant retaliated against the Plaintiff for opposing age discrimination by: (1) reassigning Plaintiff and stripping her of her primary duties, (2) placing Plaintiff on administrative leave, (3) terminating Plaintiff's employment, (4) degrading Plaintiff in front of coworkers, (5) failing to implement adequate policies to prevent discriminatory and retaliatory behavior, (6) assigning younger, inexperienced, male employees to

Plaintiff's positions, (7) subjecting Plaintiff to a hostile work environment by allowing younger, male employees to threaten Plaintiff by brandishing a deadly weapon generally in her direction and presence, and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying debris, (8) subjecting Plaintiff to unequal terms of employment, (9) and refusing to allow Plaintiff to attend training classes for personal and professional growth.

178. The Defendant failed to prevent the retaliatory behavior by not having adequate policies in place. Defendant failed to take remedial actions upon being notified of the retaliatory behavior.

179. Defendant is liable for the retaliatory actions committed against the Plaintiff.

180. As a result of the retaliatory treatment, Plaintiff suffered lost wages, humiliation, lost benefits, pain, and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendant's violations of her rights including:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper.

COUNT XV: DISABILITY DISCRIMINATION

181. Plaintiff realleges the above stated paragraphs of this complaint as stated fully herein.

182. The purpose of the IHRA is to provide clear, strong, consistent, enforceable standards addressing discrimination against individuals with disabilities. 775 ILCS 5/1-102(A)

183. Plaintiff is an employee within the definition of 775 ILCS 5/2-101(A) and a person with a disability within the meaning of 775 ILCS 5/1-103(I).

184. Plaintiff notified Defendant of her multiple ailments with the earliest notifications occurring November 2014. Plaintiff provided written correspondence to Defendant Sheriff on or about January 12, 2015; March 23, 2015; and August 28, 2015.

185. Defendant Sheriff subjected Plaintiff to humiliating behavior after being notified of her disabilities. For instance, Defendant Sheriff assigned work tasks to Plaintiff which aggravated Plaintiff's disabilities. Furthermore, Defendant Sheriff engaged in verbal comments and gestures regarding Plaintiff's disabilities alongside Plaintiff's coworkers. Defendant Sheriff failed to address harassing comments and gestures made towards Plaintiff upon the Plaintiff's complaints regarding the behavior.

186. Defendants failed to implement policies to adequately prevent discrimination based upon Plaintiff's disabilities.

187. Defendants are liable for the discriminatory treatment against Plaintiff.

188. As a proximate result of the discriminatory treatment, Plaintiff suffered lost wages, lost employee benefits, humiliation, and pain and mental anguish.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled to as a result of Defendant's violations of her rights including but not limited to:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper.

COUNT XVI: RETALIATION FOR OPPOSING DISABILITY DISCRIMINATION

189. Plaintiff realleges each above stated paragraph as if stated fully here.

190. The IHRA also prohibits retaliation against individuals opposing disability discrimination.

191. The Plaintiff reported her disability to Defendant Sheriff on at least four occasions, beginning November 2014.

192. Subsequently, Plaintiff reported discriminatory treatment due to her disability to Defendant Sheriff.

193. Defendant Sheriff retaliated against Plaintiff for opposing the discriminatory treatment by: (1) refusing to adequately investigate Plaintiff's allegations, (2) reassigning Plaintiff and stripping her of her primary duties, (3) placing Plaintiff on administrative leave, (4) terminating Plaintiff's employment, (5) degrading Plaintiff in front of coworkers, (6) failing to implement adequate policies to prevent discriminatory and retaliatory behavior, (7) assigning younger, inexperienced, male employees to Plaintiff's positions, (8) subjecting Plaintiff to a hostile work environment by allowing younger, male employees to threaten Plaintiff by brandishing a deadly weapon generally in her direction and presence, and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying debris, (9) subjecting Plaintiff to unequal terms of employment, (10) and refusing to allow Plaintiff to attend training classes for personal and professional growth.

194. Defendant did not implement policies and procedures to prevent retaliatory treatment against employees. Further, Defendant did not implement prompt remedial measures; instead, choosing to push Plaintiff out.

195. Defendants are liable for the retaliation committed against the Plaintiff.

196. As a proximate result of the retaliatory treatment, Plaintiff suffered from lost wages, lost employee benefits, suffered humiliation, pain and mental anguish as described above.

WHEREFORE, Plaintiff seeks all damages to which she is legally entitled as a result of Defendant violating her rights including:

a. Lost Wages
b. Lost Benefits
c. Humiliation and Embarrassment
d. Pain and Anguish
e. Litigation Expenses including Attorney's Fees
f. Any other relief this Court deems just and proper.

COUNT XVII: RETALIATORY DISCHARGE

197. Plaintiff realleges the above stated paragraphs as if restated herein.

198. It is the policy of the State of Illinois to promote fair methods of employment by preventing discriminatory treatment of employees on the basis of race, color, religion, sex, national origin. It is also the policy of the State of Illinois to prevent retaliation against individuals who oppose discrimination on the basis of race, color, religion, sex, and national origin. 775 ILCS 5/1-102(A).

199. Plaintiff refused to engage in, or be subjected to, discriminatory behavior against individuals, including herself, on the basis of sex, age, and disability. Plaintiff reported the behavior to Defendants via her supervisors, Sheriff Everett and Chief Deputy Milner

200. Following Plaintiff's refusal, Defendant engaged in a systematic scheme of retaliation by (1) giving younger, less experienced males priority in position assignment over legitimate business needs, (2) subjecting Plaintiff to a hostile work environment by berating Plaintiff, and allowing younger, male coworkers to berate Plaintiff extensively while not subjecting male employees to similar treatment, (3) giving younger, less experienced males authority over Plaintiff, (4) subjecting Plaintiff to a hostile work environment by allowing younger, male employees to threaten Plaintiff with the brandishing a deadly weapon generally in her direction and firing a weapon directly at Plaintiff in which Plaintiff was struck by flying debris, (5) reassigning Plaintiff, (6) failing to adequately address Plaintiff's complaints, (7) refusing to allow Plaintiff to attend training classes for personal and professional growth, (8) subjecting Plaintiff to unequal terms of employment, and (9) constructively discharging Plaintiff without proper notice and hearing.

201. Defendants are liable for retaliatory acts up to and including retaliatory discharge.

202. As a direct and proximate result of Defendant's retaliatory discharge, Plaintiff suffered lost wages, lost benefits, humiliation, pain and anguish.

WHEREFORE, Plaintiff seeks all damages in which she is legally entitled as a result of Defendant's violations including:

a. Lost Wages

b. Lost Benefits

c. Humiliation and Embarrassment

d. Pain and Anguish

e. Litigation Expenses including Attorney's Fees

f. Any other relief this Court deems just and proper

CONCLUSION

WHEREFORE, cause having been shown, Plaintiff pray for an order entering judgement grant the foregoing requests as well as any such other relief this Court deems just and fair.

JURY DEMAND

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully demands a trial by jury on all issues triable by a jury.

Respectfully submitted,

KAUFHOLD & ASSOCIATES, P.C.

By: */s/ Kevin C. Kaufhold*

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